

HERRICK, FEINSTEIN, LLP
Two Park Avenue
New York, New York 10016
Telephone: (212) 592-1400
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Sean E. O'Donnell
Stephen B. Selbst
Steven B. Smith
Christopher Carty

*Special Conflicts Counsel to the Official Committee of
Unsecured Creditors of Sears Holdings Corporation, et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- x -----
In re: : Chapter 11
: .
SEARS HOLDINGS CORPORATION, et al., : Case No. 18-23538 (RDD)
: .
Debtors¹ : (Jointly Administered)
: .
: .
----- x -----

**ELEVENTH MONTHLY FEE STATEMENT OF HERRICK, FEINSTEIN
LLP FOR PROFESSIONAL SERVICES RENDERED AND DISBURSEMENTS
INCURRED AS SPECIAL CONFLICTS COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD OF
OCTOBER 1, 2020 THROUGH OCTOBER 31, 2020**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); SHC Licensed Business LLC (3718); SHC Promotions LLC (9626); Sears Brands Management Corporation (5365); and SRE Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179

Name of Applicant:	Herrick, Feinstein LLP
Authorized to Provide Professional Services To:	Special Conflicts Counsel to the Official Committee of Unsecured Creditors of Sears Holdings Corporation, <i>et al.</i>
Date of Retention:	March 22, 2019 <i>nunc pro tunc</i> to January 2, 2019
Period for Which Compensation and Reimbursement Is Sought:	October 1, 2020 through October 31, 2020
Monthly Fees Incurred:	\$234,679.50
20% Holdback:	\$46,935.90
Total Compensation Less 20% Holdback:	\$187,743.60
Monthly Expenses Incurred:	\$11,354.59
Total Fees and Expenses Requested:	\$199,098.19

This is a x monthly ___ interim ___ final application

Herrick Feinstein LLP (“Herrick Feinstein”), special conflicts counsel to the Official Committee of Unsecured Creditors (the “Creditors’ Committee”) of Sears Holding Corporation and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby respectfully submits this statement of fees and disbursements (the “Eleventh Combined Monthly Fee Statement”) covering the period from October 1, 2020 through October 31, 2020 (the “Compensation Period”) in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Interim Compensation Order”) [ECF No. 796]. By the Eleventh Combined Monthly Fee Statement, and after taking into account certain voluntary discounts and reductions, Herrick Feinstein requests (a) interim allowance and payment of compensation in the amount of \$187,743.60 (80% of \$234,679.50) for fees on account of reasonable and necessary professional services rendered to the Creditors’ Committee by Herrick Feinstein, and (b) reimbursement of actual and necessary costs and

expenses in the amount of \$11,354.59 incurred by Herrick Feinstein during the Compensation Period.

**FEES FOR SERVICES RENDERED
DURING THE COMPENSATION PERIOD**

Exhibit A sets forth a timekeeper summary that includes the respective names, positions, department, bar admissions, hourly billing rates and aggregate hours spent by each Herrick Feinstein professional and paraprofessional that provided services to the Creditors' Committee during the Compensation Period. The rates charged by Herrick Feinstein for services rendered to the Creditors' Committee are the same rates that Herrick Feinstein charges generally for professional services rendered to its non-bankruptcy clients.

Exhibit B sets forth a task code summary that includes the aggregate hours per task code spent by Herrick Feinstein professionals and paraprofessionals in rendering services to the Creditors' Committee during the Compensation Period.

Exhibit C sets forth a complete itemization of tasks performed by Herrick Feinstein professional and paraprofessionals that provided services to the Creditors' Committee during the Compensation Period.

**EXPENSES INCURRED
DURING THE COMPENSATION PERIOD**

Exhibit D sets for a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Herrick Feinstein in connection with services rendered to the Creditors' Committee during the Compensation Period.

Exhibit E sets forth a complete itemization of disbursements incurred by Herrick Feinstein in connection with services rendered to the Creditors' Committee during the Compensation Period.

NOTICE AND OBJECTION PROCEDURES

Notice of this Eleventh Combined Monthly Fee Statement shall be given by hand or overnight delivery or email where available upon (i) Sears Holdings Corporation, 3333 Beverly Road, Hoffman Estates, Illinois 60179, Attention: Mohsin Y. Meghji ([email: mmeghji@miiipartners.com](mailto:mmeghji@miiipartners.com)); (ii) counsel to the Debtors, Weil, Gotshal & Manges LLP, 767 Eighth Avenue, New York, NY 10153, Attention: Ray C. Schrock ([email: ray.schrock@weil.com](mailto:ray.schrock@weil.com)), Jacqueline Marcus ([email:jacqueline.marcus@weil.com](mailto:jacqueline.marcus@weil.com)), Garrett A. Fail ([email: garrett.lail@weil.com](mailto:garrett.lail@weil.com)), and Sunny Singh ([email: sunny.singh@weil.com](mailto:sunny.singh@weil.com)); (iii) William K. Harrington, the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014, Attention: Paul Schwartzberg ([e-mail: paul.schwartzberg@usdoj.gov](mailto:paul.schwartzberg@usdoj.gov)) and Richard Morrissey ([e-mail: richard.morrissey@usdoj.gov](mailto:richard.morrissey@usdoj.gov)); (iv) counsel to Bank of America, N.A., Skadden, Arps, Slate, Meagher & Flom LLP, 4 Times Square, New York, NY 10036, Attention: Paul D. Leake ([email:paul.leake@skadden.com](mailto:paul.leake@skadden.com)), Shana A. Elberg ([email:shana.elberg@skadden.com](mailto:shana.elberg@skadden.com)) and George R. Howard ([email: george.howard@skadden.com](mailto:george.howard@skadden.com)); (v) Paul E. Harner, fee examiner, 1675 Broadway, New York, NY 10019 ([e-mail: harnerp@ballardspahr.com](mailto:harnerp@ballardspahr.com)); (vi) counsel to the fee examiner, Ballard Spahr LLP, 1675 Broadway, New York, NY 10019, Attention: Vincent J. Marriott ([e-mail: marriott@ballardspahr.com](mailto:marriott@ballardspahr.com)) and Tobey M. Daluz ([e-mail: dalurt@ballardspahr.com](mailto:dalurt@ballardspahr.com)); and (vi) counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036, Attention: Philip C. Dublin (email: pdublin@akingump.com), Ira S. Dizengoff (email: idizengoff@akingump.com) and Sara Lynne Brauner (email: sbrauner@akingump.com), (collectively, the “Notice Parties”).

Objections to this Eleventh Combined Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties so as to be received no later than **November 27, 2020**

(the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

If no objections to this Eleventh Combined Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

If an objection to this Eleventh Combined Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Eleventh Combined Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

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Dated: New York, New York
November 13, 2020

HERRICK FEINSTEIN LLP

By: /s/ Stephen B. Selbst
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Steven B. Smith
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*Special Conflicts Counsel to the Official
Committee of Unsecured Creditors of Sears
Holdings Corporation, et al.*

Exhibit A

Timekeeper Summary

PARTNERS	DEPARTMENT	YEAR OF BAR ADMISSION	RATE	HOURS	AMOUNT
Sean E. O'Donnell	Restructuring & Finance Litigation	1998	\$1025.00	9.0	\$9,225.00
Christopher W. Carty	Restructuring & Finance Litigation	2010	\$785.00	71.3	\$55,970.50
Steven Smith	Restructuring & Finance Litigation	2001	\$765.00	1.2	\$918.00
Total Partners				81.5	\$66,113.50
COUNSEL	DEPARTMENT	YEAR OF BAR ADMISSION	RATE	HOURS	AMOUNT
Kyle J. Kolb	Restructuring & Finance Litigation	2012	\$610.00	54.6	\$33,306.00
Michelle Sekowski	Restructuring & Finance Litigation	2003	\$685.00	1.3	\$890.50
Total Counsel				55.9	\$34,196.50
ASSOCIATES	DEPARTMENT	YEAR OF BAR ADMISSION	RATE	HOURS	AMOUNT
Heather M. Zimmer	Restructuring & Finance Litigation	2017	\$435.00	85.7	\$37,279.50
Gabrielle R. Fromer	Restructuring & Finance Litigation	2018	\$420.00	17.0	\$7,140.00
Elizabeth J. Plowman	Restructuring & Finance Litigation	2018	\$420.00	8.3	\$3,486.00
Silvia Stockman	Restructuring & Finance Litigation	2016	\$435.00	16.6	\$7,221.00

Daniel Field	Restructuring & Finance Litigation	2016	\$435.00	29.4	\$12,789.00
Rodger Quigley	Restructuring & Finance Litigation	2017	\$420.00	105.20	\$44,184.00
Conor Anderson	Restructuring & Finance Litigation	2017	\$415.00	28.6	\$11,869.00
Total Associates				290.8	\$123,968.50

PARALEGALS/ NON-LEGAL STAFF	DEPARTMENT	RATE	HOURS	AMOUNT
Linda Schepp	Restructuring & Finance Litigation	\$335.00	28.2	\$9,447.00
Larisa Poretsky	Litigation	390.00	1.5	\$585.00
Total Paralegals/ Non-Legal Staff			29.7	\$10,032.00

ADDITIONAL LEGAL SERVICES

MANAGING ATTORNEY'S OFFICE	Amount
Research/Retrieval – Calls to Courts	\$369.00
TOTAL	\$369.00

EXHIBIT B

Task Code Summary

Task Code	HOURS	AMOUNT (\$)
Fee/Employment Applications - B160	2.3	\$1,213.00
Contested Matters (excl. Assumption/rejection) – B190	21.10	\$13,023.00
Jointly Asserted Causes of Action	233.9	\$220,443.50
Total	257.3	\$234,679.50

Exhibit C

Itemized Fees



HERRICK

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

November 12, 2020
Invoice Number: 539160
Matter Number: 19609.0001
Tax ID: 1662

Re: **Sears Bankruptcy**

Fees for legal services rendered through October 31, 2020	\$14,236.00
Expenses posted through October 31, 2020	10,093.85
TOTAL	<u>\$24,329.85</u>
Unpaid balance from previous invoice(s)	\$478,982.41
Total Due Now	\$503,312.26

Kindly return this page with your check payment to:

Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:

Citibank, N.A.

ABA Number: 6165
Account Number: 6165
SWIFT #:

PLEASE REMIT PAYMENT WITHIN 30 DAYS

HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/02/20	K. Kolb	B190	Research work product privilege issue in connection with deposition preparation	0.20
10/02/20	K. Kolb	B190	Analyze further information provided by opposing counsel	0.10
10/03/20	K. Kolb	B190	Analyze privilege logs and scope of prior ESI collection in connection with preparing for Cyrus deposition	0.60
10/04/20	K. Kolb	B190	Revise summary of potential claims	1.00
10/05/20	S. Smith	B190	Review discovery efiles and attention to and review of emails with K. Kolb.	0.90
10/05/20	K. Kolb	B190	Revise memo to UCC regarding potential claims	1.30
10/05/20	M. Sekowski	B190	Review file re: search term issues and correspondence with K. Kolb and S. Smith re: same	0.60
10/06/20	K. Kolb	B190	Analyze expert commentary on financial data from opposing counsel	0.30
10/07/20	M. Sekowski	B190	Review file re: search term issues and telephone call to S. Smith re: same	0.40
10/08/20	S. Smith	B190	T/C with M. Sekowski re discovery issues.	0.30
10/08/20	M. Sekowski	B190	Telephone conference with S. Smith re: search term history and review	0.30
10/09/20	K. Kolb	B190	Discuss deposition progress with C. Carty	0.10
10/11/20	K. Kolb	B190	Revise memo to UCC regarding investigation	0.40
10/11/20	K. Kolb	B190	Analyze memo from expert team regarding exposure information	0.20
10/12/20	K. Kolb	B190	Revise update memo based on feedback from expert team	0.50
10/13/20	S. O'Donnell	B190	Review/comment on update to steering committee re cyrus claims; present same; coordinate Barclays proffer	0.80
10/13/20	K. Kolb	B190	Further revisions to memo to UCC	0.20
10/13/20	K. Kolb	B190	Attend update call with committee members	0.80
10/14/20	C. Carty	B190	Team strategy call regarding investigation and prepare for same.	0.70
10/14/20	K. Kolb	B190	Discuss case strategy with C. Carty and G. Fromer	0.30
10/14/20	G. Fromer	B190	Discuss case strategy and next steps with Kyle Kolb and Chris Carty	0.30
10/15/20	S. O'Donnell	B190	Strategy call w/ team.	0.50
10/15/20	K. Kolb	B190	Prepare for additional proffer and case analysis discussion	0.30



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Matter Number: 19609.0001
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
10/15/20	G. Fromer	B190	Discuss case strategy and next steps with Sean O'Donnell, Chris Carty, and Kyle Kolb	0.20
10/16/20	K. Kolb	B190	Prepare topic list for further depositions	0.40
10/16/20	G. Fromer	B190	Draft topic list to prepare for questioning bidder	1.00
10/16/20	G. Fromer	B190	Email Chris Carty regarding topic list for questioning bidder	0.10
10/19/20	C. Carty	B190	Call with counsel to Barclays regarding investigation next steps.	0.30
10/19/20	K. Kolb	B190	Prepare for and attend call with opposing counsel regarding next steps in investigation	0.60
10/20/20	S. O'Donnell	B190	UCC memo and proffer coordination.	0.50
10/20/20	S. O'Donnell	B190	Outline of same.	0.50
10/26/20	C. Carty	B160	Attention to issues related to fee applications.	0.80
10/26/20	S. Stockman	B190	Continue 2LR review.	4.60
10/28/20	G. Fromer	B190	Discuss deposition outlines with Kyle Kolb via email	0.10
10/28/20	G. Fromer	B190	Draft deposition outline	0.70
10/30/20	L. Poretsky	B160	Revise, redact, finalize and e-file Tenth Monthly Fee Statement; submit to Prime Clerk for service; circulate filed copy to the team	1.50
10/31/20	K. Kolb	B190	Draft complaint	1.00
				TOTAL
				\$14,236.00

LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Carty	1.80	785.00	1,413.00
G. Fromer	2.40	420.00	1,008.00
K. Kolb	8.30	610.00	5,063.00
S. O'Donnell	2.30	1,025.00	2,357.50
L. Poretsky	1.50	390.00	585.00
M. Sekowski	1.30	685.00	890.50
S. Smith	1.20	765.00	918.00
S. Stockman	4.60	435.00	2,001.00
TOTAL	23.40		\$14,236.00

DISBURSEMENTS:

AMOUNT



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	<u>AMOUNT</u>
E-Discovery Data Hosting	115.00
Expert Witness Fees	9,195.00
Online Research	783.85
TOTAL:	<u>\$10,093.85</u>

TASK SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Amount</u>
B160	Fee/Employment Applications	2.30	1,213.00
B190	Other Contested Matters	21.10	13,023.00
TOTALS		23.40	\$14,236.00

PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
354102	04/20/20	23,692.04	18,975.54	4,716.50
355261	05/29/20	113,746.72	103,232.62	10,514.10
356215	06/30/20	78,000.27	0.00	78,000.27
356647	07/16/20	62,817.18	0.00	62,817.18
358157	08/24/20	43,825.32	0.00	43,825.32
538311	10/22/20	279,109.04	0.00	279,109.04
Total Outstanding				\$478,982.41



HERRICK

Official Committee of Unsecured Creditors of Sears Holdings
Attn: Ron Tucker
225 W. Washington Street
Indianapolis, IN 46204

November 12, 2020
Invoice Number: 539161
Matter Number: 19609.0002
Tax ID: 1662

Re: **Jointly Asserted Causes of Action**

Fees for legal services rendered through October 31, 2020	\$220,443.50
Expenses posted through October 31, 2020	1,260.74
	TOTAL <u><u>\$221,704.24</u></u>
Unpaid balance from previous invoice(s)	\$926,246.66
Total Due Now	\$1,147,950.90

Kindly return this page with your check payment to:

Herrick, Feinstein LLP
2 Park Avenue
New York, NY 10016

Send wire payments to:

Citibank, N.A.

ABA Number: 6165
Account Number: 6165
SWIFT #:

PLEASE REMIT PAYMENT WITHIN 30 DAYS

HERRICK, FEINSTEIN LLP • Two Park Avenue • New York, NY 10016 • Phone: 212.592.1400 • Fax: 212.592.1500



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LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/01/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	2.80
10/01/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	3.10
10/01/20	K. Kolb	Further research regarding potential claims and required allegations	1.70
10/01/20	K. Kolb	Draft revised review protocol email and supervise second level review process	2.80
10/01/20	K. Kolb	Further analysis and revisions to summary of hot documents produced by third parties	1.20
10/01/20	K. Kolb	Analyze and summarize key documents produced by Wachtell	0.60
10/01/20	K. Kolb	Analyze privilege logs from Deloitte	0.20
10/01/20	K. Kolb	Discuss document review issues with L. Schepp	0.30
10/01/20	C. Anderson	Draft Deloitte potential causes of action memo and review engagement letters	0.90
10/01/20	C. Anderson	Draft memorandum re: potential causes of action.	1.20
10/01/20	D. Field	Review documents produced in adversary proceeding	0.30
10/01/20	E. Plowman	Review and analyze docs in adversary proceeding	1.60
10/01/20	R. Quigley	Review documents in production	5.20
10/01/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft and finalize memorandum/chart incorporating information from same	1.90
10/01/20	H. Zimmer	Review emails from KK and H5 concerning document review	0.20
10/01/20	H. Zimmer	Revise draft email from KK concerning overview of document review	0.20
10/01/20	H. Zimmer	Confer with CC and KK concerning document review	0.10
10/01/20	H. Zimmer	Confer with LS and KK concerning document review	2.10
10/01/20	L. Schepp	Compile requested Hot documents for Akin attorney review.	1.50
10/02/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	1.50
10/02/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	1.10



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/02/20	K. Kolb	Revise and analyze engagement letters related to memo for potential claims	1.50
10/02/20	K. Kolb	Further discussions with review team regarding changes to review protocol	0.80
10/02/20	K. Kolb	Analyze response from Akin regarding third party discovery	0.20
10/02/20	K. Kolb	Analyze documents previously withheld by third party subpoena recipient	0.70
10/02/20	C. Anderson	Draft Deloitte potential causes of action memo and review engagement letters	1.50
10/02/20	D. Field	Review documents produced in adversary proceeding	4.20
10/02/20	E. Plowman	Review and analyze docs in adversary proceeding	2.30
10/02/20	H. Zimmer	Confer with DF and KK concerning document review	0.20
10/02/20	H. Zimmer	Review email from Akin concerning Blackstone subpoena and confer with KK and LS concerning same	0.30
10/02/20	H. Zimmer	Review documents produced in adversary proceeding	0.30
10/02/20	L. Schepp	Compile Deloitte engagement letters in H5 workspace for attorney review.	4.50
10/02/20	L. Schepp	Compile documents noted in included in Blackstone document production for further review.	1.40
10/04/20	K. Kolb	Draft email to opposing counsel regarding supplemental parameters for production	0.10
10/04/20	D. Field	Review documents produced in adversary proceeding	1.30
10/05/20	C. Carty	Attention to issues related to third party discovery.	0.70
10/05/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	2.40
10/05/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	4.30
10/05/20	K. Kolb	Analyze statute of limitations issue	0.50
10/05/20	K. Kolb	Draft revised parameters for Blackstone response	0.60
10/05/20	K. Kolb	Supervise second level review process	0.70
10/05/20	C. Anderson	Draft emails re: BX search terms for new production	0.20
10/05/20	C. Anderson	Review engagement letters with SHC for relevant contract terms	1.00
10/05/20	D. Field	Review documents produced in adversary	2.90



HERRICK

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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		proceeding	
10/05/20	H. Zimmer	Confer with KK on document review	0.10
10/05/20	H. Zimmer	Confer with LS and KK concerning document review and Wachtell subpoena	0.10
10/05/20	H. Zimmer	Review emails between Akin and Herrick concerning Blackstone subpoena	0.10
10/05/20	H. Zimmer	Confer with KK and CA concerning Blackstone subpoena	0.20
10/05/20	H. Zimmer	Review email from Cravath concerning subpoena on Ross Aronstam and RPT privilege	0.10
10/05/20	H. Zimmer	Review email from KK to Blackstone concerning subpoena	0.10
10/05/20	H. Zimmer	Confer with KK concerning document review	0.20
10/05/20	L. Schepp	Work with K. Kolb regarding document review protocol.	0.80
10/06/20	K. Kolb	Analyze documents for second level review and supervise second level review process	0.70
10/06/20	K. Kolb	Analyze proposed revisions to search terms for third party subpoena	0.10
10/06/20	R. Quigley	Analyze and code documents in productions	4.50
10/06/20	S. Stockman	Continue 2L Review of documents.	1.70
10/06/20	H. Zimmer	Confer with KK on Blackstone subpoena	0.20
10/06/20	H. Zimmer	Email CA, KK, MC, DF, GF, EP, RQ, CC, and LS concerning updates on document review	0.10
10/06/20	H. Zimmer	Review documents produced in adversary proceeding and communications with Akin on same	0.20
10/06/20	H. Zimmer	Review email from EP concerning document review	0.10
10/06/20	H. Zimmer	Confer with LS and KK concerning document review and Wachtell subpoena	0.80
10/06/20	L. Schepp	Run searches in H5 to separate certain documents for secondary review, per K. Kolb.	3.20
10/07/20	C. Carty	Call with Akin and K. Kolb re document review and prepare for same.	0.90
10/07/20	C. Carty	Attention to issues related to third party discovery.	1.50
10/07/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	3.20
10/07/20	K. Kolb	Supervise second level review and update review team on changes to protocol	0.90
10/07/20	K. Kolb	Call with R. Tizravesh regarding document review process	0.30



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/07/20	K. Kolb	Discuss second level review issues with D. Field	0.20
10/07/20	C. Anderson	Draft and revise memorandum on causes of action	3.00
10/07/20	D. Field	Review documents produced in adversary proceeding	4.00
10/07/20	R. Quigley	Analyze and code documents in productions	6.80
10/07/20	H. Zimmer	Confer with KK concerning document review	0.10
10/07/20	H. Zimmer	Confer with KK and CC concerning third-party discovery	0.10
10/07/20	H. Zimmer	Confer with KK and H5 concerning document review	0.30
10/07/20	H. Zimmer	Review email from Wilmer Hale concerning Blackstone subpoena	0.10
10/08/20	C. Carty	Participate in meet and confer call with counsel to Blackstone and prepare for same.	1.00
10/08/20	C. Carty	Draft letter re third party discovery.	0.50
10/08/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	3.60
10/08/20	K. Kolb	Prepare for and attend meet and confer with counsel for Blackstone	1.20
10/08/20	K. Kolb	Review research on choice of law issue	0.10
10/08/20	K. Kolb	Conduct second level review of key documents	1.90
10/08/20	C. Anderson	Analyze choice of law analysis in light of governing law and dispute resolution provisions and draft related emails	0.30
10/08/20	D. Field	Review documents produced in adversary proceeding	4.80
10/08/20	R. Quigley	Analyze and code documents in productions	3.20
10/08/20	H. Zimmer	Revise Girard/Robbins parameters and confer with CC and KK regarding third-party discovery	0.90
10/08/20	H. Zimmer	Review and amend discovery memo	1.40
10/08/20	H. Zimmer	Confernce call with Wilmer Hale and counsel to Blackstone concerning Blackstone subpoena	0.30
10/08/20	H. Zimmer	Review emails from KK and LS concerning document review	0.20
10/08/20	H. Zimmer	Review documents produced in adversary proceeding	0.20
10/08/20	L. Schepp	Update document production index.	1.80
10/08/20	L. Schepp	Run searches to compile document families with high attachments counts for attorney review, per K. Kolb.	2.10
10/09/20	C. Carty	Attention to issues related to third party	0.60



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		discovery.	
10/09/20	C. Carty	Review and analyze documents produced by third party subpoena recipients.	2.50
10/09/20	C. Carty	Analyze potential claims and causes of action against certain third parties.	1.70
10/09/20	K. Kolb	Analyze key documents produced by third parties and supervise second level review	1.90
10/09/20	K. Kolb	Email to opposing counsel regarding revisions to subpoena response parameters	0.20
10/09/20	K. Kolb	Discuss discovery issues with C. Carty and H. Zimmer	0.50
10/09/20	C. Anderson	Draft and revise memorandum on potential causes of action	1.70
10/09/20	C. Anderson	Draft emails re: memo structure	0.30
10/09/20	D. Field	Review documents produced in adversary proceeding	4.80
10/09/20	R. Quigley	Analyze and code documents in productions	2.40
10/09/20	H. Zimmer	Conference call with KK and CC regarding third party discovery and document review	0.50
10/09/20	H. Zimmer	Confer with KK regarding Blackstone subpoena	0.10
10/09/20	H. Zimmer	Confer with LS and KK concerning document review	0.20
10/09/20	L. Schepp	Run searches in H5 to separate certain documents for secondary review, per K. Kolb.	2.60
10/10/20	K. Kolb	Revise memorandum regarding potential auditor causes of action	1.70
10/10/20	C. Anderson	Draft emails re: memorandum on potential causes of action	0.10
10/11/20	K. Kolb	Draft research summary and recommendation regarding privilege dispute	1.00
10/11/20	D. Field	Review documents produced in adversary proceeding	1.20
10/12/20	C. Carty	Analyze issues related to potential claims against certain third parties and review legal analysis re same.	4.20
10/12/20	C. Carty	Calls with co-counsel at Akin regarding potential claims against certain third parties and prepare for same..	1.10
10/12/20	C. Carty	Review and analyze documents produced in adversary proceeding.	2.10
10/12/20	S. O'Donnell	Confer w/ CC re claims analysis; confer w/ Akin re same; confer w/ client	0.50
10/12/20	C. Anderson	Review Wachtell document productions and	1.80



<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		related emails on review procedure	
10/12/20	D. Field	Review documents produced in adversary proceeding	1.10
10/12/20	R. Quigley	Analyze and code documents in productions	8.40
10/12/20	H. Zimmer	Confer with KK and CC on Wachtell subpoena	0.10
10/12/20	H. Zimmer	Analyze documents produced in adversary proceeding and confer with KK on same	1.00
10/13/20	C. Carty	Prepare for call with Litigation Designees regarding potential estate claims.	3.50
10/13/20	C. Carty	Meet with litigation team regarding document review.	0.50
10/13/20	C. Carty	Attention to issues related to document review.	1.20
10/13/20	C. Carty	Participate in call with Litigation Designees regarding claim analysis.	1.10
10/13/20	C. Carty	Draft complaint asserting estate claims against certain third parties.	3.20
10/13/20	C. Carty	Review draft tolling agreement and provide comments to same.	0.80
10/13/20	S. O'Donnell	Review/comment on update to steering committee re Wachtel claims; present same; coordinate tolling agreement, complaint and claim preparation	2.50
10/13/20	K. Kolb	Prepare for and attend call regarding case update and document review second level review	1.20
10/13/20	K. Kolb	Draft tolling agreement	1.00
10/13/20	K. Kolb	Analyze documents in connection with drafting of adversary claims	5.30
10/13/20	C. Anderson	Review and analyze Wachtell document production for relevant documents	0.40
10/13/20	C. Anderson	Confer with case team re: document review points, analysis and timing	0.30
10/13/20	D. Field	Review documents produced in adversary proceeding	1.10
10/13/20	G. Fromer	Team call to discuss document review strategy	0.30
10/13/20	E. Plowman	Team call re review of documents for adversary proceeding	0.30
10/13/20	S. Stockman	Confer with second level review team regarding strategy for ongoing review.	0.30
10/13/20	H. Zimmer	Analyze documents produced in adversary proceeding, confer with KK and CC on same, revise memorandum on document review process, and draft portion of complaint on WLRK claims	5.10



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/13/20	H. Zimmer	Review documents produced in adversary proceeding	0.70
10/13/20	H. Zimmer	Conference call with CC, KK, EP, DF, RQ, SS, GF, and CA on documents produced in adversary proceeding	0.30
10/13/20	L. Schepp	Located and compile various hot document citations in second level batches in preparation for attorney review.	3.80
10/14/20	C. Carty	Revise draft tolling agreement and circulate to potential defendant.	1.20
10/14/20	C. Carty	Draft complaint asserting estate claims against certain third parties.	5.80
10/14/20	S. O'Donnell	Attend to potential additional claims and complaint.	1.00
10/14/20	K. Kolb	Analyze documents and draft complaint	4.00
10/14/20	C. Anderson	Review Wachtell document production for relevant documents and issues	1.90
10/14/20	G. Fromer	Review email instructions on document review procedure from Kyle Kolb	0.30
10/14/20	G. Fromer	Review mini chron topic memo to prepare for second level document review	0.20
10/14/20	G. Fromer	Review hot doc summaries	0.10
10/14/20	G. Fromer	Review document review instructions and analysis to prepare for second level review	0.50
10/14/20	G. Fromer	Conduct second level document review	2.80
10/14/20	R. Quigley	Analyze and code documents in productions	4.30
10/14/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.80
10/14/20	H. Zimmer	Analyze memorandum on potential claims, review case law on same, and draft proposed complaint	3.10
10/14/20	H. Zimmer	Confer with CC on draft complaint	0.20
10/14/20	L. Schepp	Update index of Wachtell invoices in preparation for attorney review, per K. Kolb.	0.30
10/15/20	C. Carty	Draft complaint asserting estate claims against certain third parties.	7.20
10/15/20	C. Carty	Negotiate tolling agreement.	1.30
10/15/20	S. O'Donnell	Coordinate tolling k; review/comment on Wachtell draft; confer re complaint; go forward strategy and analysis w/ team	2.00
10/15/20	K. Kolb	Analyze documents produced by Deloitte	0.70
10/15/20	K. Kolb	Analyze proposed revisions to search term parameters	0.70
10/15/20	K. Kolb	Draft portions of complaint	0.60



<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u> HOURS</u>
10/15/20	K. Kolb	Analyze revisions to tolling agreement	0.50
10/15/20	K. Kolb	Supervise second level review process	0.20
10/15/20	G. Fromer	Discuss potential claims with Sean O'Donnell, Chris Carty, and Kyle Kolb	0.20
10/15/20	R. Quigley	Analyze and code documents in productions	6.80
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.40
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.20
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/15/20	H. Zimmer	Analyze draft of tolling agreement	0.30
10/15/20	H. Zimmer	Review emails concerning tolling agreement	0.20
10/15/20	H. Zimmer	Confer with KK, SO, and CC concerning tolling agreement	0.20
10/15/20	H. Zimmer	Email Herrick team on tolling agreement and document review	0.40
10/15/20	H. Zimmer	Analyze documents produced in adversary proceeding and revise review memorandum	1.80
10/16/20	K. Kolb	Analyze key documents produced by third party professionals	1.00
10/16/20	R. Quigley	Analyze and code documents in productions	8.80
10/16/20	H. Zimmer	Analyze documents produced in adversary proceeding	4.00
10/16/20	H. Zimmer	Confer with KK and CC re: third-party discovery	0.10
10/16/20	H. Zimmer	Confer with KK on document review	0.20
10/18/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.10
10/18/20	H. Zimmer	Analyze documents produced in adversary proceeding	4.30
10/19/20	C. Carty	Analyze Wachtell proposal regarding search terms.	0.80
10/19/20	K. Kolb	Discuss revisions to Wachtell parameters and communicate same to opposing counsel	0.40
10/19/20	G. Fromer	Review email from Heather Zimmer regarding second level review	0.10
10/19/20	G. Fromer	Conduct second level review of documents relating to pre-Seritage transactions	1.80
10/19/20	R. Quigley	Analyze and code documents in productions	4.10
10/19/20	H. Zimmer	Confer with KK and CC on documents produced in adversary proceeding	0.20
10/19/20	H. Zimmer	Analyze documents produced in adversary	5.10



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		proceeding	
10/19/20	H. Zimmer	Conference call with KK and CC concerning WLRK subpoena	0.20
10/19/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.80
10/19/20	H. Zimmer	Confer with KK and CC concerning e-mail to WLRK concerning subpoena	0.10
10/20/20	S. O'Donnell	Doc review confer.	0.50
10/20/20	K. Kolb	Conduct second level review of key documents from Wachtell and Deloitte productions	0.60
10/20/20	C. Anderson	Review Wachtell document product for relevant documents and hot or of interest productions	1.40
10/20/20	R. Quigley	Analyze and code documents in productions	7.30
10/20/20	H. Zimmer	Review emails from KK concerning document review	0.20
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.90
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.70
10/20/20	H. Zimmer	Review documents produced in adversary proceeding	1.00
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.00
10/20/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.00
10/21/20	K. Kolb	Analyze key documents produced by third parties in response to subpoenas	0.70
10/21/20	C. Anderson	Review and analyze document production for relevant documents and of interest productions	2.00
10/21/20	E. Plowman	Review and analyze docs in adversary proceeding	1.80
10/21/20	R. Quigley	Analyze and code documents in productions	2.00
10/21/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.30
10/21/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.80
10/22/20	C. Anderson	Review and analyze document productions for relevant documents and issues	2.20
10/22/20	G. Fromer	Discuss document review with Heather Zimmer	0.10
10/22/20	E. Plowman	Review and analyze documents in adversary proceeding	2.30
10/22/20	R. Quigley	Analyze and code documents in productions	8.60
10/22/20	H. Zimmer	Confer with Herrick on documents produced in	0.20



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		adversary proceeding	
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.00
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding and confer with KK on same	1.30
10/22/20	H. Zimmer	Anlayze documents produced in adversary proceeding	1.10
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.30
10/22/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.40
10/23/20	K. Kolb	Supervise second level review of subpoena productions	0.20
10/23/20	C. Anderson	Review document production for relevant documents and issues	2.20
10/23/20	R. Quigley	Analyze and code documents in productions	6.60
10/23/20	S. Stockman	Continue 2L Review of adversary production.	1.30
10/23/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.50
10/23/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.10
10/23/20	H. Zimmer	Review email from Blackstone's counsel concerning subpoena on them	0.10
10/23/20	H. Zimmer	Confer with KK and LS concerning document review	0.10
10/23/20	H. Zimmer	Review documents produced in adversary proceeding	0.40
10/23/20	L. Schepp	Create search of documents with high attachment counts for attorney review, per K. Kolb.	1.40
10/24/20	K. Kolb	Analyze documents produced in response to subpoenas	1.00
10/25/20	H. Zimmer	Analyze documents produced in adversary proceeding	2.10
10/25/20	H. Zimmer	Analyze documents produced in the adversary proceeding and revise review memoranda on same	1.20
10/26/20	K. Kolb	Analyze key documents produced in response to subpoenas to professionals	0.50
10/26/20	C. Anderson	Review document production for relevant documents and issues	0.40
10/26/20	C. Anderson	Review document production for relevant documents and issues	0.30
10/26/20	G. Fromer	Conduct second level review of documents	1.80



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
		relating to pre-Seritage transactions	
10/26/20	R. Quigley	Analyze and code documents in productions	4.20
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.40
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.50
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.20
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/26/20	H. Zimmer	Email WLRK concerning subpoena	0.10
10/26/20	H. Zimmer	Review documents produced in adversary proceeding and analysis provided by Silvia Stockman on same	0.20
10/26/20	H. Zimmer	Analyze documents produced in adversary proceeding	2.70
10/27/20	C. Carty	Call with Wachtell and Defendant's regarding search related to subpoena.	0.30
10/27/20	C. Carty	Analyze issues related to Wachtell search parameters.	1.30
10/27/20	S. O'Donnell	Confer re Wachtell call.	0.20
10/27/20	K. Kolb	Meet and confer call with Wachtell regarding subpoena compliance	0.40
10/27/20	K. Kolb	Analyze key documents from third party productions	0.60
10/27/20	C. Anderson	Review document production for relevant documents	0.90
10/27/20	G. Fromer	Conduct second level review of documents relating to pre-Seritage transactions	4.40
10/27/20	R. Quigley	Analyze and code documents in productions	5.30
10/27/20	H. Zimmer	Prepare for call re: Wachtell subpoena and attend conference call with Wachtell and Wilmer Hale, Kyle Kolb, and Chris Carty concerning subpoena to Wachtell and production in response to same	0.70
10/27/20	H. Zimmer	Revise memorandum on document review	0.20
10/27/20	H. Zimmer	Review emails to Wachtell and from Wilmer Hale concerning Wachtell subpoena	0.10
10/28/20	K. Kolb	Analyze key documents produced by professionals and attend to second level review supervision	0.20
10/28/20	C. Anderson	Review document production for relevant documents and issues	3.20
10/28/20	R. Quigley	Analyze and code documents in productions	4.20



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/28/20	S. Stockman	Review adversary production.	4.70
10/28/20	H. Zimmer	Confer with KK and LS concerning document review and review documents	0.40
10/28/20	H. Zimmer	Review email from KK concerning litigation status	0.10
10/28/20	H. Zimmer	Review documents produced in adversary proceeding and analysis shared by RQ, SS, and GF concerning hot documents	0.60
10/28/20	L. Schepp	Compile additional hot documents for attorney review, per K. Kolb.	1.20
10/29/20	K. Kolb	Supervise second level review process	0.40
10/29/20	K. Kolb	Analyze key documents produced by third party professionals	2.30
10/29/20	C. Anderson	Review document production for relevant documents and issues	1.40
10/29/20	D. Field	Review documents produced in adversary proceeding	1.10
10/29/20	R. Quigley	Analyze and code documents in productions	6.90
10/29/20	S. Stockman	Review adversary production.	4.00
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.60
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	1.40
10/29/20	H. Zimmer	Analyze documents produced in adversary proceeding	0.70
10/29/20	L. Schepp	Compile additional hot documents for attorney review, per K. Kolb.	2.40
10/30/20	C. Carty	Review and analyze documents produced in third party discovery.	2.50
10/30/20	K. Kolb	Supervise second level review process	0.50
10/30/20	K. Kolb	Analyze documents produced by debtor professionals	0.70
10/30/20	D. Field	Review documents produced in adversary proceeding	2.60
10/30/20	G. Fromer	Conduct second level review of documents related to pre-Seritage transactions	1.70
10/30/20	G. Fromer	Review email from Kyle Kolb regarding second level document review	0.10
10/30/20	G. Fromer	Review summaries of documents of interest	0.20
10/30/20	R. Quigley	Analyze and code documents in productions	5.60
10/30/20	H. Zimmer	Analyze documents produced in adversary	2.40



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<u>DATE</u>	<u>NAME</u>	<u>NARRATIVE</u>	<u> HOURS</u>
10/30/20	H. Zimmer	proceeding	
10/30/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft chart incorporating information from same	1.50
10/30/20	H. Zimmer	Confer with KK ,CA, LS, DF, GF, EP, RQ, SS concerning review of documents produced in adversary proceeding	0.30
10/30/20	H. Zimmer	Confer with KK and LS on review of documents produced in adversary proceeding	0.20
10/30/20	L. Schepp	Compile additional hot or interesting documents for second level review.	1.20
10/31/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft chart of hot documents	2.50
10/31/20	H. Zimmer	Analyze documents produced in adversary proceeding and draft chart incorporating information from same	1.40
10/31/20	H. Zimmer	Review prior memorandum to Akin concerning hot documents and draft chart on hot documents	0.70
			434.50
		TOTAL	\$220,074.50



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LEGAL SERVICES SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
C. Anderson	28.60	415.00	11,869.00
C. Carty	69.50	785.00	54,557.50
D. Field	29.40	435.00	12,789.00
G. Fromer	14.60	420.00	6,132.00
K. Kolb	46.30	610.00	28,243.00
S. O'Donnell	6.70	1,025.00	6,867.50
E. Plowman	8.30	420.00	3,486.00
R. Quigley	105.20	420.00	44,184.00
L. Schepp	28.20	335.00	9,447.00
S. Stockman	12.00	435.00	5,220.00
H. Zimmer	85.70	435.00	37,279.50
TOTAL	434.50		\$220,074.50

MANAGING ATTORNEY'S OFFICE

Research/Retrieval - including calls to courts	369.00
TOTAL	\$369.00

TOTAL LEGAL SERVICES	\$220,443.50
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DISBURSEMENTS:

	<u>AMOUNT</u>
Online Research	1,260.74
TOTAL:	<u>\$1,260.74</u>



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PREVIOUS BILLS OUTSTANDING

<u>Invoice #</u>	<u>Invoice Date</u>	<u>Original Amount</u>	<u>Less Credits Applied</u>	<u>Balance</u>
354103	04/20/20	291,925.09	233,580.69	58,344.40
355208	05/28/20	390,062.88	312,050.88	78,012.00
356200	06/30/20	189,860.63	0.00	189,860.63
356648	07/16/20	154,837.24	0.00	154,837.24
358158	08/24/20	114,394.47	0.00	114,394.47
538312	10/22/20	330,797.92	0.00	330,797.92
Total Outstanding				\$926,246.66

Exhibit D

Disbursement Summary

Online Research	\$2,044.59
E-Discovery Data Hosting	\$115.00
Professional Fees – Consultant Fees	\$9,195.00
Total	\$11,354.59

Exhibit E

Itemized Disbursement

Sears Matter 1 Disbursement Detail

Bill Amount
E-Discovery Data Hosting Minimum Charge (115)
\$100.00
E-Discovery Data Hosting per Gig Charge (116)
\$15.00
Expert Witness Fees (026)
\$9,195.00
Online research - West (075)
\$783.85

Discovery Data Hosting Minimum Charge (115) > Disbursement Entries (1) > Summarize by: None		Disbursement Type: All	
Date	Disb Code	Bill Amount	Narrative
10/31/2020	E-Discovery Data Hosting Minimum Charge (115)	\$100.00	Simon Property Group - Sears Bankruptcy

Date	Disb Code	Bill Amount	Narrative	Bill Disb Code	Actual Timekeeper	Bill Quantity	Hard/Soft
10/31/2020	E-Discovery Data Hosting per Gig Charge (116)	\$15.00		E-Discovery Data Hosting per Gig Charge (116)	Herrick, Feinstein - Firm (0000)	1	Soft

Disb Code	Bill Amount	Narrative	Bill Disb Code
Expert Witness Fees (026)	\$9,195.00	Vendor: Capital Market Risk Advisors; Invoice#: 2020-00268; Date: 11/1/2020	Expert Witness Fees (026)

Date	Disb Code	Bill Amount	Narrative	Bill Disb Code	Actual Timekeeper
10/1/2020	Online research - West (075)	\$28.43	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Rosen, Nathan (1209)
10/1/2020	Online research - West (075)	\$81.11	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Carty, Christopher (1309)
10/1/2020	Online research - West (075)	\$215.49	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Kolb, Kyle (1326)
10/1/2020	Online research - West (075)	\$228.62	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Grillo, Allison (1213)
10/1/2020	Online research - West (075)	\$230.20	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Rosen, Nathan (1209)

Sears Matter 2 Disbursement Detail

Bill Amount
Online research - West (075) \$1,260.74

Date	Disb Code	Bill Amount	Narrative	Bill Disb Code	Actual Timekeeper
10/1/2020	Online research - West (075)	\$85.28	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Kolb, Kyle (1326)
10/1/2020	Online research - West (075)	\$85.28	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Kolb, Kyle (1326)
10/1/2020	Online research - West (075)	\$85.28	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Zimmer, Heather (1319)
10/1/2020	Online research - West (075)	\$101.19	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Zimmer, Heather (1319)
10/1/2020	Online research - West (075)	\$198.99	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Fromer, Gabrielle (1324)
10/1/2020	Online research - West (075)	\$284.27	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Kolb, Kyle (1326)
10/1/2020	Online research - West (075)	\$420.45	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 0843086507; Date: 10/1/2020	Online research - West (075)	Kolb, Kyle (1326)



Invoice ID: 2020-00268
Account number: 26
Project Id: 26
Invoice date: November 1, 2020

Capital Market Risk Advisors
4851 Tamiami Trail North
Suite 243
Naples, FL 34103
Attn: Accounting

Kyle Kolb

Herrick Feinstein LLP
2 Park Avenue
New York, NY 10016

Invoice Total			\$9,195.00
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See attached spreadsheet for invoice specification.

NAME	AVERAGE RATE	TOTAL HOURS	TOTAL AMOUNT
Nie	400.00	3.3	1,320.00
Niculescu	1,250.00	6.3	7,875.00
Grand Total	\$1,007.14	9.6	\$9,195.00

Please note the total unpaid balance to date is \$214,167.50

Please remit payment with the statement number to Capital Market Risk Advisors at the address listed above or via wire. Contact QBTTeam@advancedprofessional.net for wire instructions.